

Bradford J. Sandler (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC
LIQUIDATING TRUST,

Plaintiff,

v.

SANOFI US CORPORATION; SANOFI-AVENTIS
U.S. L.L.C.,

Defendants.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 22-02055 (PRW)

SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendants, Sanofi US Corporation and Sanofi Aventis U.S. L.L.C. (“Defendants”) and, together with Plaintiff, the “Parties”, by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendants;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendants were served with the Summons and Complaint; and

WHEREAS, on February 21, 2022, the Parties entered into a stipulation (the "First Stipulation") by which the time required for Defendants to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered February 23, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendants to answer the Complaint to and including May 13, 2022.

2. All other terms set forth in the First Stipulation remain in full force and effect.

Dated: April 12, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

Bradford J. Sandler (NY Bar No. 4499877)

Ilan D. Scharf (NY Bar No. 4042107)

Jason S. Pomerantz (CA Bar No. 157216)

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Email: bsandler@pszjlaw.com

ischarf@pszjlaw.com

jspomerantz@pszjlaw.com

Counsel to Plaintiff RDC Liquidating Trust

Dated: April 12, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

Alissa K. Piccione

Alissa K. Piccione (NY Bar No. 5330527)

Andrew L. Buck (NY Bar No. 2790996)

875 Third Avenue

New York, NY 10022

Telephone: (212) 704-6000

Email: alissa.piccione@troutman.com

andrew.buck@troutman.com

*Counsel to Defendants Sanofi US Corporation;
Sanofi-Aventis U.S. L.L.C.*

SO ORDERED:

DATED: _____, 2022
Rochester, New York

HON. PAUL R. WARREN
United States Bankruptcy Judge